EXHIBIT 207

1	
2	UNITED STATES DISTRICT COURT FOR THE
3	SOUTHERN DISTRICT OF NEW YORK
4	COMEDNMENT OF THE INTERP
5	GOVERNMENT OF THE UNITED STATES OF AMERICA,
6	Plaintiff,
7	v Case No. 1:22-cv-10904-UA
8	JPMORGAN CHASE BANK, N.A.,
9	Defendant,
10	
11	
12	
13	
14	CONFIDENTIAL
15	VIDEOTAPED DEPOSITION OF
16	STACEY E. PLASKETT
17	Tuesday, May 9, 2023
18	9:00 a.m. EST
19	
20	
21	
22	
23	
24	Reported by: Goldy Gold, RPR
25	Job No. J9647388



1	STAC	EY PLASKETT - CONFIDENTIAL	
2	Q.	What was your book going to be?	09:23
3	Α.	It was going to be a historical book	09:23
4	about earlier	life, maybe a generation or so ago,	09:23
5	in the Virgin	Islands.	09:23
6	Q.	And what was the law firm that you	09:23
7	worked for ini	tially?	09:24
8	Α.	I worked with Nichols Newman Logan.	09:24
9	Q.	And how long were you with Nichols	09:24
10	Newman Logan?		09:24
11	Α.	I was there until 2007.	09:24
12	Q.	Which was how I didn't ask you	09:24
13	actually when	you first moved down?	09:24
14	Α.	I think I moved down in 2005, so	09:24
15	approximately	two years.	09:24
16	Q.	Okay. And what kind of work were	09:24
17	you doing at N	ichols Newman for those two years?	09:24
18	Α.	Primarily transactional. And also	09:24
19	in the Virgin	Islands at that time, all attorneys	09:24
20	did court-appo	inted work. Most of the lawyers in	09:24
21	the firm were	not courtroom attorneys, and so I	09:24
22	did a lot of t	he courtroom appearances for the	09:24
23	law firm.		09:24
24	Q.	Okay. And then 2007, you moved to a	09:24
25	new job?		09:24



1	STACEY PLASKETT - CONFIDENTIAL	
2	A. Yes.	09::24
3	Q. What was that?	09:: 24
4	A. I was hired as the counsel for the	09::24
5	Virgin Islands Economic Development Authority.	09::25
6	(Court reporter clarification.)	
7	BY MR. NEIMAN:	09::25
8	Q. What is the Virgin Islands Economic	09::25
9	Development Authority?	09::25
10	A. The Virgin Islands Economic	09::25
11	Development Authority is a semi-autonomous agency	09::25
12	in the Virgin Islands, which handles many	09::25
13	incentives to bring as well as grow businesses in	09::25
14	the territory through various vehicles: A	09::25
15	government development bank, which gives loans to	09::25
16	businesses, small businesses predominantly; a tax	09::25
17	incentive program under the U.S. code, which	09::25
18	allows businesses and individuals to receive tax	09::25
19	reductions on federal taxes for businesses and	09::25
20	employment that they bring to the territory.	09::25
21	Q. And you described this as a	09::25
22	semi-autonomous agency?	09::26
23	A. Correct.	09::26
24	Q. Can you explain what you meant by	09::26
25	that?	09::26
		1



A. When I lost. Q. Okay. And when you went to work for 11:04 the Kellerhals firm, how long did you work there? 11:04 A. I don't recall the time frame, but 11:04 tit would have been 2013. Q. I know that in the past, at least, 11:04 Ms. Kellerhals had done work for Mr. Epstein 11:04 and/or his companies. 11:04 Did you, while you were at the firm, 11:04 do any work for Epstein or any Epstein-related 11:04 A. I don't recall. 11:04 G. What kind of work did you do at the 11:04 firm? 11:04 A. Predominantly transactional for 11:04	1	STACEY PLASKETT - CONFIDENTIAL	
Q. Okay. And when you went to work for the Kellerhals firm, how long did you work there? A. I don't recall the time frame, but 11:04 it would have been 2013. Q. I know that in the past, at least, 11:04 Ms. Kellerhals had done work for Mr. Epstein 11:04 and/or his companies. 11:04 do any work for Epstein or any Epstein-related businesses? 11:04 A. I don't recall. 11:04 it m? Q. What kind of work did you do at the firm? 11:04 firm? 11:04 a few advice related to the economic development. 11:05 businesses remained a client of the Kellerhals firm during the time that you were there; is that 11:05 fair? 11:05 A. Yes. 11:05	2	you were going to run for Congress again?	11::04
the Kellerhals firm, how long did you work there? A. I don't recall the time frame, but 11:04 it would have been 2013. 11:04 B. Q. I know that in the past, at least, 11:04 Ms. Kellerhals had done work for Mr. Epstein 11:04 and/or his companies. 11:04 Did you, while you were at the firm, 11:04 do any work for Epstein or any Epstein-related 11:04 businesses? 11:04 A. I don't recall. 11:04 G. What kind of work did you do at the 11:04 firm? 11:04 A. Predominantly transactional for 11:04 companies that were in the Virgin Islands and for 11:04 a few advice related to the economic development. 11:05 Q. And I take it that Epstein and his 11:05 businesses remained a client of the Kellerhals firm during the time that you were there; is that 11:05 fair? 11:05 A. Yes. 11:05	3	A. When I lost.	11::04
A. I don't recall the time frame, but it would have been 2013. Q. I know that in the past, at least, Ms. Kellerhals had done work for Mr. Epstein 11:04 and/or his companies. Did you, while you were at the firm, do any work for Epstein or any Epstein-related businesses? A. I don't recall. Q. What kind of work did you do at the firm? A. Predominantly transactional for companies that were in the Virgin Islands and for a few advice related to the economic development. Q. And I take it that Epstein and his businesses remained a client of the Kellerhals firm during the time that you were there; is that fair? A. Yes. 11:04 A. Yes.	4	Q. Okay. And when you went to work for	11::04
7 it would have been 2013. 8 Q. I know that in the past, at least, 9 Ms. Kellerhals had done work for Mr. Epstein 11:04 10 and/or his companies. 11:04 11 Did you, while you were at the firm, 11:04 12 do any work for Epstein or any Epstein-related 13 businesses? 11:04 13 A. I don't recall. 15 Q. What kind of work did you do at the 16 firm? 11:04 16 firm? 11:04 17 A. Predominantly transactional for 11:04 18 companies that were in the Virgin Islands and for 11:04 19 a few advice related to the economic development. 10:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05	5	the Kellerhals firm, how long did you work there?	11::04
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Q. And I take it that Epstein and his 11:05 21 businesses remained a client of the Kellerhals 22 firm during the time that you were there; is that 11:05 23 fair? 24 A. Yes. 11:05	18	companies that were in the Virgin Islands and for	11::04
businesses remained a client of the Kellerhals firm during the time that you were there; is that fair? A. Yes. 11:05	19	a few advice related to the economic development.	11::05
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23 fair? 11::05 24 A. Yes. 11::05	21	businesses remained a client of the Kellerhals	
24 A. Yes. 11:05	22	firm during the time that you were there; is that	11::05
	23	fair?	11::05
Q. All right. Let's talk about a 11:05	24	A. Yes.	11::05
	25	Q. All right. Let's talk about a	11::05



1	STA	CEY PLASKETT - CONFIDENTIAL	
2	A.	I don't recall.	12::28
3	Q.	Did you talk to Mr. Epstein about	12::28
4	this press re	lease?	12::28
5	A.	I don't recall.	12:: 28
6	Q.	Just going back to the press release	12::28
7	for a moment.	I'm sorry.	12:: 28
8		You'll see in the third paragraph,	12:: 28
9	there's a des	cription of you having received	12:: 28
10	\$5,400 in two	separate contributions from Epstein	12::28
11	on August 2nd	, according to federal campaign	12::28
12	finance recor	ds, right?	12:: 28
13	A.	Yes.	12::28
14	Q.	And that was true, right? You had	12::28
15	gotten two do	nations from Mr. Epstein personally	12:: 28
16	on or about A	ugust 2nd of 2016?	12::29
17	A.	Yes, totaling \$5,400.	12::29
18	Q.	Okay. And that was so August 2nd	12::29
19	was about two	weeks after the text exchange with	12::29
20	Erika about w	hat building you should be going to	12::29
21	for a meeting	with Mr. Epstein, right? That's	12::29
22	Exhibit 20?		12::29
23	A.	State the date again?	12::29
24	Q.	I said it's about two weeks after	12::29
25	A.	Yes.	12::29
			1



1	STACEY PLASKETT - CONFIDENTIAL	
2	A. Virgin Islands' politics, national	02::16
3	politics, campaign contribution.	02::16
4	Q. Okay. Do you remember what your ask	02::16
5	was?	02::16
6	A. No.	02::16
7	Q. Were you trying to raise money for	02::16
8	the DCCC at this time?	02::17
9	A. I think I was always trying to raise	02::17
10	money for the Democratic Congressional Campaign	02::17
11	Committee.	02::17
12	Q. That's one of the jobs of being a	02::17
13	Democratic congressperson, correct?	02::17
14	A. Yes.	02::17
15	Q. And you had a total of \$250,000 that	02::17
16	you were supposed to try to raise?	02::17
17	A. Members of Congress, based upon	02::17
18	their seniority and committee assignments, have	02::17
19	dues as well as raise amounts that are requested.	02::17
20	Q. And do you recall yours being around	02::17
21	\$250,000 in this time period?	02::17
22	A. I don't recall at that time period	02::17
23	what it was, but that does not sound	02::17
24	unreasonable.	02::17
25	Q. It does not sound unreasonable?	02::17



1	STACEY PLASKETT - CONFIDENTIAL	
2	A. No.	02::17
3	Q. Okay. And that's a lot of money?	02:: 17
4	A. Yes.	02:: 17
5	Q. So who were your prospects for	02::17
6	raising that kind of money?	02:: 17
7	A. Individuals who had donated before,	02::17
8	alumni, individuals who were interested in the	02::17
9	same topics for which committees I sat on, other	02::18
10	Democratic donors throughout the country,	02:: 18
11	et cetera.	02::18
12	Q. Was Mr. Epstein on that list of	02::18
13	people who would be a potential help in raising	02:: 18
14	money for the DCCC?	02:: 18
15	A. Yes.	02:: 18
16	Q. Did you ask him to contribute to	02::18
17	that?	02:: 18
18	A. Yes.	02:: 18
19	Q. Was that part of what was discussed	02::18
20	at this meeting in September?	02:: 18
21	A. I don't recall if it's that	02:: 18
22	specific, but it's possible, yes.	02:: 18
23	Q. Are there limits to the amount that	02::18
24	any individual can donate to the DCCC?	02:: 18
25	A. Yes.	02:: 18



1	STACEY PLASKETT - CONFIDENTIAL	
2	Q. What are the limits?	02::18
3	A. At that time, I believed an	02::18
4	individual could give over 30,000. I can't	02::18
5	remember the exact amount, but it was in the	02::18
6	range of 30,000.	02:: 18
7	Q. How much did you ask Mr. Epstein to	02::18
8	give?	02::18
9	A. To the maximum, whatever that	02::18
10	maximum was.	02:: 19
11	Q. Okay. How do you get somebody to	02:: 19
12	give that much money?	02::19
13	A. You ask them.	02:: 19
14	Q. Okay. Did Mr. Epstein ever ask for	02:: 19
15	anything from you?	02::19
16	A. No.	02::19
17	MR. NEIMAN: Let me know mark now as	02:: 19
18	Plaskett Exhibit 40, a one-page text	02:: 19
19	exchange.	02:: 20
20	[Exhibit 40, September 2018 text	02:: 20
21	exchange, was marked for identification.]	02:: 20
22	BY MR. NEIMAN:	02::20
23	Q. All right. Ms. Plaskett, I've	02:: 20
24	handed you Exhibit 40, which is a text exchange	02:: 20
25	between you and Jerome, your chief of staff, in	02::20



1	STACEY PLASKETT - CONFIDENTIAL	
2	Jeffrey Epstein, right?	02:: 25
3	A. Yes. I believe I'm instructing	02:: 25
4	Jerome to send it to Erika and to let her know	02:: 25
5	about the conversation I had with him about it.	02:: 25
6	Q. With the idea that she would then	02:: 25
7	reach out to Mr. Epstein to arrange the	02:: 25
8	contribution?	02:: 25
9	A. Yes.	02:: 25
10	Q. And do you recall that the DCCC	02:: 25
11	rejected Mr. Epstein's contribution?	02:: 26
12	A. Yes.	02::26
13	Q. Tell me what you remember about	02:: 26
14	that.	02:: 26
15	A. To the best of my recollection, I	02::26
16	recall that I was informed by my chief of staff	02:: 26
17	that the DCCC informed him that Mr. Epstein's	02:: 26
18	contribution would not be accepted by the DCCC.	02:: 26
19	Q. What did you do when you heard that?	02::26
20	A. I'm not sure who if I can recall	02:: 26
21	who I reached out to at that point to inform.	02:: 26
22	Q. Okay. Did you do anything to try to	02:: 26
23	find out why the Democratic Congressional	02::26
24	Campaign Committee had rejected Mr. Epstein's	02:: 26
25	donation?	02::26



1	STACEY PLASKETT - CONFIDENTIAL	
2	A. I don't recall if it was already	02:: 26
3	expressed to me in his letting me know that it	
4	was denied or if I got additional information. I	02::26
5	don't recall.	02:: 27
6	Q. Do you recall what you learned was	02:: 27
7	the reason why the DCCC would not accept	02:: 27
8	Mr. Epstein's contribution?	02:: 27
9	A. Yes.	02:: 27
10	Q. What was that?	02:: 27
11	A. That he had not passed their	02:: 27
12	vetting.	02:: 27
13	Q. What did you understand that to be a	02:: 27
14	reference to?	02:: 27
15	A. I did not know the specifics of what	02:: 27
16	that vetting was.	02:: 27
17	Q. Did you assume that it related to	02:: 27
18	his status as a sex offender?	02:: 27
19	MR. ECKARD: Object to form.	02::27
20	THE WITNESS: I was not sure of the	02:: 27
21	totality of the circumstances.	02:: 27
22	BY MR. NEIMAN:	02:: 27
23	Q. Did learning that the DCCC had	02:: 27
24	declined to accept Mr. Epstein's contribution	02:: 27
25	because he had not passed their vetting cause you	02:: 27



1	STACEY PLASKETT - CONFIDENTIAL	
		0.4.00
2	record at 4:21.	04:: 22
3	BY MR. NEIMAN:	04:: 22
4	Q. All right. Congresswoman, this	04:: 22
5	won't take too much longer.	04:: 22
6	MR. NEIMAN: I'm going to hand you a	04:: 22
7	document that's marked as Plaskett	04:: 22
8	Exhibit 54.	04:: 22
9	[Exhibit 54, 2014 to 2020 donor	04:: 22
10	list, was marked for identification.]	04:: 22
11	MR. ECKARD: Counsel, this one	04:: 22
12	doesn't have a Bates number. Was it	04:: 22
13	produced?	04:: 22
14	MR. NEIMAN: Yes. This was produced	04:: 22
15	as a native.	04:: 22
16	BY MR. NEIMAN:	04:: 22
17	Q. So, Congresswoman, you were asked	04:: 22
18	some questions about the number of donors that	04:: 22
19	you have and the like by Mr. Ackerman, and I just	04::22
20	want to show you your actual list that you	04:: 22
21	produced of your donors, at least from the 2014	04:: 22
22	cycle through the 2020 cycle. Okay?	04:: 22
23	Do you see that?	04::23
24	A. Yes.	04::23
25	Q. And what we've done is we've	04:: 23



1	STACEY PLASKETT - CONFIDENTIAL	
2	highlighted the particular individuals on this	04:: 23
3	list who are either Epstein or Epstein-affiliated	04:: 23
4	persons who made contributions to your campaign	04:: 23
5	in those cycles. Okay?	04:: 23
6	A. I'm looking through it.	04:: 23
7	Q. Yes. Let me know when you're ready.	04:: 23
8	A. Okay. Yes.	04:: 23
9	Q. And you can see on page 3 that	04:: 23
10	Mr. Epstein appears as a donor, and that his	04:: 23
11	lifetime total to your campaigns for the 2014	04:: 23
12	through 2020 campaign cycles was \$8,100	04:: 23
13	personally, correct?	04:: 24
14	A. I see that number, yes.	04:: 24
15	Q. And then if you look at the next	04:: 24
16	page, you can that Lesley Groff, who you	04:: 24
17	corresponded with in connection with Mr. Epstein,	04:: 24
18	also donated to your campaign?	04:: 24
19	A. Yes.	04::24
20	Q. And she donated 2,600. Do you see	04:: 24
21	that?	04:: 24
22	A. Yes, I see that.	04:: 24
23	Q. And then if you look at the next	04:: 24
24	page after that, you can see that Darren Indyke,	04:: 24
25	who we saw was the person who presented on behalf	04:: 24



1	STACEY PLASKETT - CONFIDENTIAL	
2	of FTC, seeking a tax extension of tax breaks	04:: 24
3	from the development authority while you were	04:: 24
4	there, gave \$10,700 to your campaign.	04:: 24
5	Do you see that?	04:: 24
6	A. Yes.	04:: 24
7	Q. And that Mr. Kahn, who is also	04:: 24
8	associated with Mr. Epstein, gave \$10,700 to your	04:: 24
9	campaign as well.	04:: 24
10	Do you see that?	04:: 24
11	A. Okay. I see.	04:: 24
12	Q. And that Bella Klein, who is	04:: 25
13	described in this document as Darren Indyke's	04:: 25
14	administrative assistant, also donated \$2,600 to	04:: 25
15	your campaign?	04:: 25
16	A. I see that.	04:: 25
17	Q. So across those five people, there's	04:: 25
18	total donations in excess of \$30,000, correct?	04:: 25
19	A. I'm adding that up. That sounds	04:: 25
20	correct.	04:: 25
21	Q. Did you have any other contributor	04:: 25
22	who donated either directly themselves, or by	04:: 25
23	themselves, and with a group of people associated	04:: 25
24	with them, more than \$30,000?	04:: 25
25	MR. ACKERMAN: Objection to form.	04:: 25

